

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

KENNETH R. WEBER,

Chapter 13

Debtor

Bankruptcy No 19-22111-TPA

Document #

**NEW REZ, LLC d/b/a SHELLPOINT
MORTGAGE SERVICING,**

Movant

Related document: Proof of Claim #10-2

VS.

KENNETH R. WEBER,

Respondent

**January 11, 2023, DECLARATION THAT EXISTING CHAPTER 13 PLAN IS
SUFFICIENT**

AND NOW comes the Debtor/Respondent **KENNETH R. WEBER** by his attorney

Susan J. Pearlstein, and respectfully states as follows:

1. The Notice of Mortgage Payment Change filed by Movant at Claim #10-2 on January 10, 2023, reflects a total monthly mortgage payment to be paid to the above secured creditor in the amount of \$610.45 effective February 1, 2023.
2. Debtor's Plan currently anticipates a mortgage payment of \$668.00 per month.
3. Therefore, no amendment to the Plan will be necessary for this change to be implemented; the total existing Chapter 13 plan payment is sufficient to pay this amount on a monthly basis.

Respectfully Submitted:

/s/ Susan J. Pearlstein, Esquire

Susan J. Pearlstein, Esquire

PA I.D. #28939

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CERTIFICATE OF SERVICE

I, Susan J. Pearlstein, Esquire, of 7110 McClure Ave., Pittsburgh, PA 15218, certify upon penalty of perjury that on the 11th day of January 2023, I served a copy of the 01/11/2023 DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT by U.S. first class mail, postage pre-paid, upon the following:

Christopher Giacito, Esquire
Padgett Law Group
6267 Old Water Oak Rd., Suite 203
Tallahassee, FL 32312

U.S. Trustee
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Kenneth R. Weber
2504 Sunset Drive
West Mifflin, PA 15122

Rhonda Winnecour, Trustee
By ECF

/s/ Susan J. Pearlstein, Esquire
Susan J. Pearlstein, Esquire
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